

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI
OXFORD DIVISION

ANNIE J. JOINER AND WILLIE E. JOINER

PLAINTIFF

V.

CIVIL ACTION NO.: 3:17 CV 061-MPM-JMV

PANOLA COUNTY COURTHOUSE BATESVILLE;
PANOLA COUNTY SHERIFF'S DEPARTMENT;
TVEPA BATESVILLE, MISSISSIPPI; AND
PANOLA COUNTY COURTHOUSE SARDIS

DEFENDANTS

JOINDER TO NOTICE OF REMOVAL

COMES NOW Tallahatchie Valley Electric Power Association, a non-party to this matter that was nonetheless purportedly served with a copy of the Summons and State-Court Complaint, and while denying that it is named as a party in the State-Court Complaint or that it has been properly served, and denying that the State-Court Complaint requests any relief against it, hereby joins in and consents to the Notice of Removal of the civil action styled by the Clerk of the Panola County Circuit Court as "*Annie J. Joiner and Willie E. Joiner v. Panola County Courthouse Batesville, Panola County Sheriff's Department, TVEPA Batesville, Mississippi and Panola County Courthouse Sardis*," Cause No.: CV2017-45GCP2, from the Circuit Court of Panola County, Second Judicial District to the United States District Court for the Northern District of Mississippi, Oxford Division, filed in this cause by defendant Panola County, Mississippi for an on behalf of the "Panola County" entities named as "Panola County Courthouse Batesville, Panola County Sheriff's Department and Panola County Courthouse Sardis" without admitting any allegations and without waiving any and all defenses which may be available to it and the right to file a responsive answer to the Plaintiff's Complaint.



Respectfully submitted,

TALLAHATCHIE VALLEY ELECTRIC
POWER ASSOCIATION

BY: 

OF COUNSEL

Ryan Revere, Esq., MS Bar. # 103652
Colmon S. Mitchell, Esq., MS Bar. # 3355
Smith, Phillips, Mitchell, Scott & Nowak, LLP
P.O. Drawer 1586
Batesville, MS 38608
662.563.4613 (phone)
662.712.2654
Counsel for TVEPA

CERTIFICATE OF SERVICE

I, Ryan Revere, do hereby certify that this Joinder to Notice of Removal will be attached to the Notice of Removal as an Exhibit and that counsel filing the Notice of Removal will serve the Notice of Removal on the following by U.S. Mail:

Willie Joiner, *pro se* plaintiff, by mailing to his address identified in the State Court Complaint, 107 MLK Jr. Dr., Apt. 4-E, Batesville, MS 38606;

Annie Joiner, *pro se* plaintiff, by mailing to her address identified in the State Court Complaint, 107 MLK Jr. Dr., Apt. 4-E, Batesville, MS 38606; and

Melissa Meek-Phelps, Circuit Clerk of Panola County, Second Judicial District, by mailing to her usual business address in Batesville, MS;

Goodloe T. Lewis, counsel for Mississippi Farm Bureau Casualty Insurance Company, by mailing to his usual business address in Oxford, MS

This the 3 day of April, 2017.

A handwritten signature in black ink, appearing to be 'R. Revere', is positioned above a horizontal line.

RYAN REVERE, ESQ.